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Myles Jacobson, Attorney
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November 15, 2005

BY FAX (413 785 0394) and Mail
AUSA Ariane Vuono
United States Attorney's Office
1550 Main Street
Springfield, MA 01103

Re: United States of America v. Naomi Watford
Criminal No. 05-30057-MAP
Discovery Letter (non-motion) (2 pages)

Dear Attorney Vuono:

My letter of November 7, 2005, included a request under Fed.R.Crim.P. 16(a)(1)(E) for a summary of the testimony of government expert witnesses. Rule 16(a)(1)(E) was the old numbering. The correct rule numbering is Rule 16(a)(1)(G). Also, consistent with the Rule, I am augmenting the November 7 request, as follows:

For each expert witness the government intends to call, please describe: (1) the witness' opinions, (2) the bases and the reasons for those opinions, and (3) the witness' qualifications.

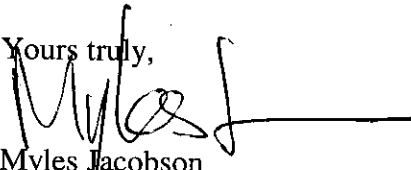
Kindly note that I am especially (but not solely) interested in any experts who might testify in connection with any process of identification of the defendant and any voice or image recognition or enhancement.

Please note that, according to Rule 16 Advisory Committee Notes, this summary should (1) provide the defendant with a fair opportunity to test the merit of the expert's testimony through focused cross-examination, (2) inform the defendant whether the expert will be providing only background information on a particular issue or whether the witness will actually offer an opinion, (3) cover not only written and oral reports, tests, reports, and investigations, but any information that might be recognized as a legitimate basis for an opinion under Federal Rule of Evidence 703, including opinions of other experts, and (4) include both scientific and

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nonscientific experts. See, Advisory Committee Notes 1993 Amendment to Rule 16(a)(1)(E) (later renumbered as 16(a)(1)(G)).

Thank you.

Yours truly,

Myles Jacobson

cc: Clerk, U.S. District Court (by mail only)